

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

E.I. DU PONT DE NEMOURS AND  
COMPANY,

Plaintiff/Judgment Creditor,

v.

KOLON INDUSTRIES, INC. A/K/A KOLON  
CORPORATION,

Defendant/Judgment Debtor,

v.

API-KOLON ENGINEERED PLASTICS A/K/A  
ADVANCE PLASTICS, INC., FILMQUEST  
GROUP, and SPONGE-CUSHION, INC.

Garnishees.

Case No. 12-cv-05644

**NOTICE OF MOTION**

To: See Certificate of Service

PLEASE TAKE NOTICE THAT on **October 23, 2012** at **8:30 a.m.** or as soon thereafter as **we may be heard**, we shall appear before the Honorable Magistrate Judge **Joan Humphrey Lefkow**, in courtroom 1925 of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, and present Plaintiff's **Motion for Writ of Garnishment**, a copy of which is served upon you herewith.

*/s/ Bryan K. Duplechain*  
Bryan K. Duplechain, IL Bar No. #6284499  
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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that copies of this **Motion for Writ of Garnishment** was served upon the below persons via regular mail, postage prepaid and properly addressed, in addition to those parties receiving notification by participation in the Court's ECF system on the 16th day of October, 2012:

*/s/ Bryan K. Duplechain*

Bryan K. Duplechain, IL Bar No. #6284499

333 West Wacker Drive, Suite 500

Chicago, IL 60606

1. Plaintiff served a Writ of Garnishment on Garnishee.
2. A timely Answer was filed by Garnishee. See Answer of Sponge Cushion, Inc. to Writ of Garnishment, attached hereto as Exhibit “A.”
3. Garnishee had in its possession or control funds, property, or effects of defendant in the form of an open account, \$206,861.21. See Exhibit “A.”
4. Plaintiff has incurred costs as a result of this garnishment.

WHEREFORE Plaintiff requests this Court grant its motion, taxing costs against the Defendant, and enter a Judgment on Garnishment ordering Garnishee to pay to the Plaintiff all sums identified in Garnishee's Answer to Writ of Garnishment.

**FILED** this 16<sup>th</sup> day of October, 2012.

Respectfully submitted,

/s/ Bryan K. Duplechain  
*Counsel for Judgment Creditor*  
*E.I. du Pont de Nemours and Company*  
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